

STATE OF OHIO                    )  
  ) SS:   AFFIDAVIT  
CUYAHOGA COUNTY            )

Scott Perlmutter, being first duly sworn according to law, deposes and states as follows:

1. I am of sound mind, over the age of 18, and have personal knowledge of the information stated below.
2. I am an attorney licensed to practice law in the State of Ohio as well as in numerous federal courts throughout the country, including the Northern District of Ohio.
3. I am lead counsel on the *Estate of Ferrell Goff v. TRACO International Group S. de R. L.*, N.D. Ohio Case No. 4:25-cv-00259, and *Estate of Ferrell Goff v. Steward Trumbull Memorial Hospital, Inc., et al.*, Trumbull County, Ohio Common Pleas Case No. 2022 CV 01323.
4. *Estate of Ferrell Goff v. Steward Trumbull Memorial Hospital, Inc., et al.*, Trumbull County, Ohio Common Pleas Case No. 2022 CV 01323 was settled at mediation on April 16, 2024.
5. TRACO participated in the mediation, through both its claims representative and retained counsel.

6. The case was settled at mediation for \$535,000. In the following weeks, the settlement, and the terms of the settlement agreement, were confirmed by TRACO through its retained counsel as shown in the true and accurate copies of e-mails attached to this motion at Exhibit 2.

7. As shown in Exhibit 2 to this motion, the terms of the settlement were finalized in their entirety by April 29, 2024.


8. In the roughly 14.5 months after the terms of the settlement were finalized, I have spent 17.5 hours attempting to enforce the settlement, primarily related to filing the instant action, researching and obtaining service on a Panamanian defendant, and preparing the filings related to Defendant's default.

9. My hourly rate of \$475 has been approved by the Northern District of Ohio in *Kuchar v. Saber Healthcare Holdings*, N.D. Ohio Case No. 1:20-cv-02542.

10. Over that same time period, my firm has incurred \$4,236.25 in expenses on this case for filing fees, process service fees, and interest accruing on expenses incurred for the underlying litigation, as shown in the itemization and invoice attached to this motion at Exhibit 3.

11. Interest on the \$535,000 settlement at Ohio's 8% per annum rate since April 16, 2024 to July 18, 2025 totals \$53,705.21.

FURTHER AFFIANT SAYETH NAUGHT.

  
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SCOTT PERLMUTER

SWORN TO AND SUBSCRIBED before me at Cuyahoga, Ohio, this 18 day of  
July, 2025.



MARY ALLISON KRAUS  
Notary Public  
State of Ohio  
My Comm. Expires  
November 28, 2026

  
\_\_\_\_\_  
Notary Public